

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re:

SCHWING AMERICA, INC.

Debtor.

Bky Case No. 09-36760  
Chapter 11

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**NOTICE OF INTENTION TO  
SEEK EXPEDITED HEARING**

The debtor in the above Chapter 11 case, gives notice that it intends to seek expedited hearings on the following matters (check all that apply):

- \_\_\_\_\_ JOINT MOTION FOR ORDER DIRECTING JOINT ADMINISTRATION OF  
RELATED BANKRUPTCY CASES
- \_\_\_\_\_ MOTION FOR ORDER EXTENDING TIME TO FILE SCHEDULES,  
STATEMENT OF FINANCIAL AFFAIRS AND CERTAIN LISTS  
REQUIRED BY BANKRUPTCY RULE 1007(c)
- X   MOTION RE MAINTENANCE OF BANK ACCOUNTS AND EXISTING  
CASH MANAGEMENT SYSTEMS
- X   MOTION TO PAY PRE-PETITION WAGES, SALARIES, AND RELATED  
BENEFITS
- X   MOTION FOR ORDER AUTHORIZING USE OF CASH COLLATERAL
- X   MOTION FOR APPROVAL OF POST-PETITION SECURED AND SUPER  
PRIORITY FINANCING PURSUANT TO SECTION 364(c) OF THE  
BANKRUPTCY CODE
- \_\_\_\_\_ MOTION, PURSUANT TO SECTION 366 OF THE BANKRUPTCY CODE,  
FOR ENTRY OF INTERIM ORDER (1) DETERMINING ADEQUATE  
ASSURANCE OF PAYMENT FOR FUTURE UTILITY SERVICES AND (2)  
RESTRAINING UTILITY COMPANIES FROM DISCONTINUING,  
ALTERING, OR REFUSING SERVICE

\_\_\_\_\_ MOTION FOR ORDER ESTABLISHING NOTICE AND ADMINISTRATIVE PROCEDURES

\_\_\_\_\_ MOTION FOR ORDER AUTHORIZING THE RETENTION OF PROFESSIONALS

\_\_\_\_\_ MOTION FOR ORDER AUTHORIZING THE FILING OF DOCUMENTS UNDER SEAL

\_\_\_\_\_ MOTION FOR ORDER AUTHORIZING PAYMENT OF CERTAIN PREPETITION CUSTOMER CLAIMS IN THE ORDINARY COURSE OF BUSINESS (E.G., GIFT CERTIFICATES, LAYAWAY CLAIMS; WARRANTY CLAIMS; REFUND POLICIES)

\_\_\_\_\_ MOTION FOR ORDER AUTHORIZING PAYMENT OF SALES AND USE TAXES

\_\_\_\_\_ MOTION FOR ORDER AUTHORIZING DEBTORS TO RETURN GOODS PURSUANT TO SECTION 546(g) OF THE BANKRUPTCY CODE

\_\_\_\_\_ MOTION FOR ORDER AUTHORIZING POSTPETITION DELIVERY OF GOODS ORDERED BY CUSTOMERS PREPETITION

\_\_\_\_\_ MOTION FOR ORDER AUTHORIZING PAYMENT OF CUSTOMS DUTIES

\_\_\_\_\_ MOTION FOR ORDER AUTHORIZING PAYMENT OF CONTRACTORS IN SATISFACTION OF LIENS

\_\_\_\_\_ MOTION FOR ORDER AUTHORIZING DEBTORS TO HONOR CERTAIN PREPETITION CLAIMS OF SHIPPERS, FREIGHT HANDLERS AND WAREHOUSERS

\_\_\_\_\_ MOTION FOR ORDER PERMITTING DEBTOR TO HONOR WORKERS' COMPENSATION PROGRAMS AND PAY INSURANCE OBLIGATIONS

\_\_\_\_\_ MOTION FOR ORDER APPROVING THE ESTABLISHMENT OF RECLAMATION PROCEDURES

\_\_\_\_\_ MOTION FOR ORDER REJECTING LEASES

\_\_\_\_\_ OTHERS (list):

Dated: September 28, 2009

RAVICH MEYER KIRKMAN  
McGRATH NAUMAN & TANSEY,  
A PROFESSIONAL ASSOCIATION

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